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FACSIMILE**Date:** June 13, 2006**Time
Sent:**

To:	Company:	Facsimile No:	Telephone No:
Examiner Michelle K. Lay	U.S. Patent and Trademark Office	571-273-8300	
From:	Elizabeth E. Kim	<i>Direct Phone:</i>	617.535.4411
<i>E-Mail:</i>	ekim@mwe.com	<i>Direct Fax:</i>	617.535.3800
<i>Sent By:</i>		<i>Direct Phone:</i>	
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Re: U.S. Patent Application No. 10/647,932**Message:**

Dear Examiner Lay,

Enclosed for your review is an updated 1-page summary of main points in response to the Office Action of May 03, 2006, for the above-referenced patent application. (It has been sharpened, compared to the summary I previously sent you, earlier this afternoon).

Thank you for your consideration, and I will call you tomorrow to set up the time for our phone interview.

-Elizabeth Kim

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Response to Office Action of May 03, 2006

(Re: US Pat. Appln. No. 10/647,932)

- **103(a) rejection of claims 1-20 and 29 over Richey in view of Oshima.**

"To establish a *prima facie* case of obviousness, . . . the prior art references must teach or suggest all of the claim limitations." MPEP 2143. That is not the case here.

One key limitation in independent claim 1 is that the content of the images be "a function of . . . a plurality of displacement steps taken by the individual":

[A] processing system . . . configured to deliver . . . a sequence of images, the content of which are a function of . . . a plurality of displacement steps taken by the individual within the structure.

Neither Richey nor Oshima discloses a processing system that varies images as a function of a plurality of displacement steps taken by the individual. Indeed, not even the Examiner has stated otherwise.

Claim 1 (and all of the other claims which are dependent on it) are therefore not obvious under 35 U.S.C. 103 over Richey in view of Oshima.

- **102(b) rejection of claim 32 over Richey 5,310,794**

Claim 32 requires that images be delivered to at least one modular wall that functions as a computer-controlled displayed and that these images vary based on the interaction between the individual and the environment.

This limitation is also lacking in Richey.

Richey does disclose delivering images to panel displays in Figure 32. However, Richey does not disclose changing those images based on the interaction between an individual and the environment.

Richey also discloses a different embodiment that updates images based on head movement. However, the images in this embodiment are delivered to a head mounted display, not to a modular wall.

The fact that one feature of the claim may be found in one apparatus and that another feature of the claim may be found in a COMPLETELY DIFFERENT apparatus does not constitute anticipation, even if both apparatuses are disclosed in the same document. This is particularly true here since the panels in Richey do not move with the individual as does the head mounted display. Indeed, it would be nonsensical to change the images that are displayed on the Richey's panels in response to head movement, as does Richey in connection with the head mounted display.

Richey simply does not teach updating images on a modular wall based on interaction between an individual and an environment, as required by the language of this claim. Again, moreover, not even the Examiner has specifically contended otherwise.

Claim 32 is therefore not anticipated by Richey.